

Jane Doe 1, et al.,

V.

Defendants.

DECLARATION OF JEFF WEBB

7. In 2020 I made a single payment to an individual I believe to reside in South Carolina. The purpose of the payment was for the individual to assist me in my work of authoring a book. The contemplated assistance was never provided and I have had no further business relationship with that individual.

8. In 1974, I founded Universal Cheerleaders Association, which later became Varsity Spirit, LLC ("Varsity"). I served as President and CEO of Varsity from its inception until stepping down from the CEO role on March 3, 2016. At that time, I continued as Chairman of the Board of Directors for Varsity until July 2018. After July 2018, I was no longer Chairman of the Board of Directors, but I continued to be employed by Varsity until December 2020. Effective December 2020, I am no longer a Varsity employee.

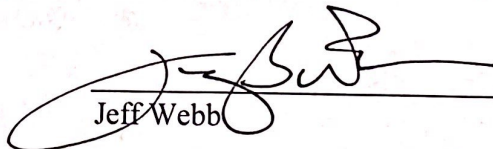
9. I currently serve as President of the International Cheer Union. International Cheer Union maintains its headquarters in Memphis, Tennessee. I maintain my office for International Cheer Union in Memphis, Tennessee.

10. At all times relevant to this suit, while serving as CEO, Chairman of the Board of Directors, or any other position for Varsity, I maintained my office at Varsity's offices in Memphis, Tennessee.

11. If called to testify to the truthfulness of the foregoing, I could competently and truthfully do so.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 16, 2022.


Jeff Webb